

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JEREMY LEVIN and DR. LUCILLE LEVIN, : 09 Civ. 5900 (RPP) (MHD)

Plaintiffs, :

-against- :

BANK OF NEW YORK, et al. :

Defendants. :

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THE BANK OF NEW YORK MELLON, et al., :

Third-Party Plaintiffs, :

-against- :

STEVEN M. GREENBAUM, et al., :

Third-Party Defendants. :

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**RESPONSE OF CITIBANK N.A. TO
JUDGMENT CREDITORS' JOINT MOTION FOR PARTIAL SUMMARY JUDGMENT
ON CLAIMS FOR TURNOVER OF PHASE TWO BLOCKED ASSETS**

Defendant/Third-Party Plaintiff Citibank N.A. ("Citibank") states for its response to the Judgment Creditors' Joint Motion for Partial Summary Judgment on Claims for Turnover of Phase Two Blocked Assets that it hereby joins in the memoranda of law filed by Société Générale, New York Branch (ECF Docket # 803) to the extent that it raises the issue of the appropriate scope of relief with respect to the payment of interest on blocked accounts, and by the JPMorgan Chase Parties and Bank of New York Mellon (ECF Docket # 804) to the extent it draws the Court's attention to the recent decisions, filings and pending appeals on the issue of

electronic fund transfers cited therein. Citibank will also file its response to Judgment Creditors' Local Rule 56.1 Separate Statement of Undisputed Facts.

Dated: New York, New York
October 22, 2012

DAVIS WRIGHT TREMAINE LLP

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